

Before the Federal Communications Commission

Washington, D.C. 20554

**In the Matter of RM-10870, Restructuring of the Amateur Radio Service**

Comments of James "Rick" Sohl, K5RIC

To the Members of the Commission:

Thank you for the opportunity to address the National Conference of Volunteer Examiner Coordinators recommended changes to the Amateur Radio Service, **a recommendation I support fully.**

I have nothing to gain as I am currently an Amateur Extra Class Operator and have been an Amateur since 1973 and I held the FCC First class Radiotelephone with Ship Radar endorsement since 1966 that is now a General Radiotelephone with Ship Radar endorsement today. The last thirty plus years I have worked in Broadcasting and Law Enforcement communications.

I do feel that some who replied that RM-10870 it not the direction for Amateur Radio, have missed the point, this is **exactly** what Amateur Radio needs and has needed for many years, the NCVEC has done a great job in proposing this.

The World Radiocommunication Conference 2003 (WRC-03) reduced the requirement to prove the ability to send and receive Morse signals to operate below 25 MHz from a mandate to an option of each signatory. Since WRC-03, the countries of Belgium, Germany, the Netherlands, Norway, Switzerland and the United Kingdom have moved to drop Morse code requirements of their countries.

The Commission itself has previously stated that Morse code has had a decreasing role in contemporary communications (NPRM 98-143 Para. 19-21). At one point, Morse code was necessary for communication. However, times have changed in the last 100 years. The military forces of the United States and other countries as well as all commercial users have ceased using Morse code radio transmissions in favor of more the technologically advanced forms of communication such as digital and satellite transmission. A requirement for Morse testing is similar to one requiring one to show how to "hitch up a horse" before they can get an automobile drivers license.

Morse code testing.

I support the NCVEC's recommendation that the Element I. Morse code test be eliminated for all classes of Amateur Radio Service licensees. I do believe that the Morse code or CW sub-bands of the high frequency (HF) segment of the Amateur Radio Service should be modified to meet current needs, but some exclusive CW, but not other digital modes, should be kept on 80, 40, 20 and 15 meter bands.

On the issue of the three tiered license proposal:

I have no objections to the NCVEC's recommendations that there be only three licenses classes, including a new Communicator Class and that current Technician Class and Technician-Plus Class licensees be automatically upgraded to General Class licensees. This can reduce the FCC need to manage the Amateur Radio Service.

Please consider this proposal as it can bring Amateur Radio into the 21 Century.

My Exceptions to those proposed in RM-10870.

Even though I support the proposal, I do feel that there is no need to require commercial built gear as this will suppress the ability of the Amateur to learn and grow. A 100 watt output limit requirement is suitable for a beginning Amateur to have on all bands.

Thank you for the opportunity to address you on these issues.

Sincerely

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